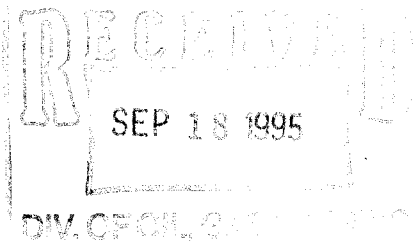


United States  
Department of  
Agriculture

Forest  
Service

Manti-La Sal  
National Forest

599 West Price River Dr.  
Price, Utah 84501  
(801) 637-2817



File Code: 2820-4

Date: September 14, 1995

Utah Division of Oil, Gas and Mining  
ATTN: David W. Darby  
355 West North Temple  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

*Lowell*  
*Copy Dave, Lamm, Lee, PAM*  
*ACT/015/032 #2*

Dear Dave:

My staff has reviewed the proposed mine plan amendment submitted by Genwal Resources, Inc., to modify the layout of longwall panels on Federal Lease UTU-68082. The Forest Service does not concur with the proposal to longwall mine under Crandall Creek on National Forest System lands, as it is not consistent with lease stipulation number 9. Our findings are based on the following information:

The Environmental Assessment prepared for the lease of tract UTU-68082 indicates that Crandall Canyon had been determined to be perennial through T 16 S, R 6 E, Section 1, and into State Lease ML-21568. This finding was not contested during either the environmental analysis process or the leasing process. The lease was issued with the standard Forest Service stipulation which precludes subsidence of perennial streams without prior approval.

Genwal's data from 1991 and 1992, as presented on Plate 7-16 of their Mining and Reclamation plan, show that both the Left and Right Forks of Crandall Canyon are perennial upstream into State Lease ML-21568. Genwal has provided no documentation that these 1991 and 1992 data are incorrect.

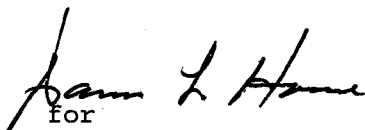
The Forest Service, accompanied by a Genwal representative, examined the Right Fork of Crandall Creek on September 7, 1995, above the point where Genwal now says the stream is no longer perennial. Based on the flow, macroinvertebrate population, stream profile, and riparian vegetation, we verified the perennial classification disclosed in the environmental assessment.

The only published data on coal mine subsidence and impacts to streams for this area is "Hydrology of the North Fork of the Right Fork of Miller Creek, Carbon County, Utah, Before, During, and After Underground Coal Mining", USGS Water-Resources Investigations Report 95-4025. It describes an area approximately 7 miles northeast of the Genwal Mine where the surface was fractured in an area of about 500 feet of overburden and diverted the stream flow into the mine. The overburden at the point where Genwal proposes to subside Crandall Creek becomes intermittent is approximately 450 to 500 feet.

The decision to consent to the subsidence study in Burnout Canyon specifically precluded allowing any additional subsidence of perennial streams on the forest until the study is completed. It will be at least 2 more years before the study is complete.

If you have any questions please contact Carter Reed or Dale Harber at (801) 637-2817.

Sincerely,

  
for

JANETTE S. KAISER  
Forest Supervisor